



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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SEP 19 2010

Ref: 8EPR-N

Rhonda O'Byrne, District Ranger
Northern Hills Ranger District
Black Hills National Forest
2014 North Main Street
Spearfish, SD 57783

RE: EPA Comments on Final Environmental
Impact Statement, Nautilus Project,
CEQ #20100357

Dear Ms. O'Byrne:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the September 2010 Final Environmental Impact Statement (FEIS) for the Nautilus Project. This FEIS was prepared by the Northern Hills Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Black Hills National Forest to disclose and assess potential environmental impacts associated with implementation of the resource management actions of the Nautilus Project in the Northern Hills Ranger District, approximately seven miles northwest of Rapid City, South Dakota. The Nautilus Project covers a total of 41,302 acres, including 35,603 acres administered by the USFS and 5,699 acres of interspersed private land.

EPA provided scoping comments on the proposed project with a December 15, 2009 letter, and we provided additional comments on the Draft Environmental Impact Statement (DEIS) with a June 24, 2010 letter. As described in the DEIS, the proposed project would modify stand structure to reduce the potential for widespread mountain pine beetle outbreaks. In addition, the project would reduce susceptibility to high-intensity wildfire, mitigate areas that are contributing to decreased watershed health, and provide opportunities for forestry research. Activities proposed to achieve these goals include prescribed burning, non-commercial thinning, commercial timber harvest, and improved maintenance of the road system. Prescribed burning could occur on approximately 25,350 acres of USFS land, but an expected scenario of 1,000 acres per year, for a total of 10,000 acres over the life of the project, is most likely. EPA expressed concerns regarding air quality, aquatic ecosystems, and the transportation network.


To address comments received on the DEIS, the FEIS includes a new Air Quality and Smoke Management discussion in Section 3.4, Fire and Fuels; additional measures and requirements in Appendix C, Design Criteria and Monitoring; and supplemental information in Appendix E, Response to Comments. Based on our review of the additional information provided in the FEIS, EPA believes its primary concerns with the DEIS have been addressed.

A new Air Quality and Smoke Management section lays out requirements for site-specific Burn Plans to be developed for this project. Requirements would be implemented for: (1) adherence to the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008); (2) identification of smoke sensitive receptors; (3) commitment to public notification of pending burns; and (4) compliance with South Dakota Department of Environment and Natural Resources (SDDENR) requirements. While appropriate smoke mitigation, modeling, and monitoring techniques should result from this process, EPA would welcome the opportunity to discuss the air quality analyses of any site-specific Burn Plans for this, and future, projects to ensure adequate protection of the National Ambient Air Quality Standards and nearby Class I and Sensitive Class II area visibility. Please note that we would continue to recommend that the FEIS summarize existing air quality near the project area to ensure that the decision-maker understands the baseline conditions and potential impacts associated with prescribed burning on the large acreage under consideration.

EPA continues to recommend that existing water quality data, whether from the SDDENR or elsewhere, should be presented in the FEIS in a more quantitative manner. However, we appreciate that new measures and requirements were added to Appendix C, Design Criteria and Monitoring, related to protection of aquatic ecosystems. These measures would provide additional protection for perennial and intermittent streams, springs and wetlands by limiting the proximity of project activities near these sensitive areas. In addition, Burn Plans would include monitoring measures to evaluate the breakdown of hydrophobic soils following burn implementation. Other new monitoring requirements would ensure that revegetation of road-stream crossings is established after three years, and if not, mitigation measures would be identified and monitored for an additional two years to ensure that revegetation occurs. Please note that EPA continues to recommend that a monitoring plan be developed to assess the effectiveness of road closures once project activities are completed.

We appreciate the opportunity to review and comment on this Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Larry Svoboda
Director, NEPA Compliance and Review Program
Ecosystems Protection and Remediation